

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**IN RE:**

**Case No.: 18-23836-JAD**

**Raymond Rhodes, Jr.,**

**Chapter 13**

**Debtor.**

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that, pursuant to Rule 9010 of the Bankruptcy Rules, **COUNTY OF ALLEGHENY**, is a creditor and hereby appears in this case.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Rule 2002 of the Bankruptcy Rules, the undersigned requests that all notices and papers specified by that Rule, and all other notices given or required to be given in this case and all other papers served or required to be served in this case, be given to and served upon:

**Jeffrey R. Hunt, Esquire  
GOEHRING, RUTTER & BOEHM  
437 Grant Street, 14<sup>th</sup> Floor  
Pittsburgh, PA 15219-6107  
TEL: (412)281-0587  
FAX: (412)281-6570**

The foregoing request includes without limitation, notices of any orders, pleadings, motions, applications, complaints, demands, hearings, requests or petitions, disclosure statements, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other document brought before this Court with respect to these proceedings, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery telephone, telegraph, telex or otherwise that (1) affects or seeks to affect in any way any rights or interest of any creditor or party in interest in the case, with respect to the (a) debtor, (b) property of the debtor's estate, or proceeds thereof, in which the debtor may claim an interest, or (c) property or proceeds thereof in the possession, custody, or control of others that the debtor may seek to use; or (2) requires or seeks to require any act, delivery of any property, payment or other conduct.

**PLEASE TAKE FURTHER NOTICE** that the COUNTY OF ALLEGHENY intends that neither this Notice of Appearance nor any later appearance, pleading, claim or suit shall waive (1) its right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; or (2) any other rights, claims, actions, defenses, setoffs, or recoupments to which it may be entitled under any agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses setoff, and recoupments are expressly reserved.

**GOEHRING, RUTTER & BOEHM,**

**Dated: 12/19/2018**

**/s/ Jeffrey R. Hunt**

**Jeffrey R. Hunt, Esquire  
Pa. I.D. #90342  
437 Grant Street, 14<sup>th</sup> Floor  
Pittsburgh, PA 15219-6107  
(412)281-0587  
Attorney for Movant  
jhunt@grblaw.com**

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**DECLARATION IN LIEU OF AFFIDAVIT**

**I certify that this request supersedes any prior request for Notice by this creditor, that there is no other request to receive Notices for the specified creditor, and that I am authorized to make this request for Notices on behalf of the named creditor.**

**GOEHRING, RUTTER & BOEHM,**

**/s/ Jeffrey R. Hunt**

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**CERTIFICATE OF MAILING OF NOTICE OR OTHER DOCUMENT TO  
PARTIES IN INTEREST**

Michael S. Geisler, Esq.  
201 Penn Center Blvd., Suite 524  
Pittsburgh, PA 15235

Office of the United States Trustee  
Liberty Center  
1001 Liberty Avenue, Suite 970  
Pittsburgh, PA 15222

Ronda J. Winnecour  
Suite 3250, USX Tower  
600 Grant Street  
Pittsburgh, PA 15219

GOEHRING, RUTTER & BOEHM,

/s/ Jeffrey R. Hunt

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